Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
1998 Biennial Regulatory Review --	)	
47 C.F.R. Part 90 - Private Land Mobile	)	WT Docket No. 98-182
Radio Services	)	RM-9222
	)	
Replacement of Part 90 by Part 88 to Revise	)	PR Docket No. 92-235
the Private Land Mobile Radio Services and	)	
Modify the Policies Governing Them	)	
and	)	
Examination of Exclusivity and Frequency	)	
Assignment Policies of the Private Land	)	
Mobile Services	)	

To: The Commission

REPLY COMMENTS OF THE CALIFORNIA STATE AUTOMOBILE ASSOCIATION

The California State Automobile Association (CSAA), by its attorney, hereby submits reply comments in the above-referenced proceeding, in order to support elimination of the current power restriction on eight dockside frequencies[1] and the designation of the American Automobile Association (AAA) as the exclusive frequency coordinator of these frequencies. The record in this proceeding demonstrates unanimous support for the former, and there are strong public interest considerations supporting the latter.

CSAA is a not-for-profit organization responsible for providing emergency road services to approximately 3.8 million members in Northern California, Nevada and Utah. CSAA is the licensee of numerous radio systems within its area of responsibility and is constantly licensing new radio systems and modifying existing systems so that it may provide the most efficient and

reliable emergency road services to its members. The area in which CSAA operates is characterized by high mountains, valleys, and desert areas, as well as densely populated urban areas such as Las Vegas and Sacramento, making it a challenge to provide reliable communications in these areas. CSAA and the other auto clubs are constantly seeking to upgrade their communications capabilities in order to provide better service, given the safety aspect of their operations.

In the past, most of the automobile clubs operated basic simplex base and mobile systems in the 150 and 452 MHz bands. Increasingly, however, CSAA and other automobile clubs are turning to the use of mobile relay systems in less populated areas, to obtain the range they need to provide efficient emergency road services. A mobile relay system increases the effective range of CSAA's mobile radios, by repeating the signals at a higher power on a paired frequency. Because the channels that the auto clubs had available in the Automobile Emergency Radio Service did not permit operation of mobile relay systems, the clubs had to use frequencies from the Business Radio Service (now included in the Industrial/Business Pool), which were generally much more congested than the auto club frequencies. This was necessary because, for example, the 457 MHz frequencies that would normally be paired with the 452 MHz auto club channels were available in the Business Radio Service and reserved for low power (2 watt or less) use for cargo handling in dockside areas. With the consolidation of the radio services into the Industrial/Business Pool, and the Commission decision to remove the dockside use restriction, the 457 MHz channels are available for assignment to auto clubs, but only for 2 watts output power.

[1] The frequencies are 457.525 MHz, 457.5375 MHz, 457.550 MHz, 457.5625 MHz, 457.575 MHz, 457.5875 MHz,

AAA has asked the Commission to raise the permissible power level on the 457 MHz channels that are normally paired with the 452 MHz channels, and to designate AAA as the exclusive coordinator of these frequencies. Doing so would allow AAA to coordinate the 452/457 MHz channels in a paired configuration so that the auto clubs may operate the mobile relay systems they require. In the process, AAA would be able to protect any cargo handling operations in dockside areas that would be entitled to such protection.

Allowing CSAA and other auto clubs to operate on the old auto club frequencies in a paired configuration would also increase the reliability of these radio systems to dispatch emergency road service vehicles. The auto clubs, including CSAA, generally controlled their base stations operating on 452 MHz frequencies by wireline. CSAA has found these systems to be unreliable during some of the most critical instances in which it must use its radio system to provide emergency road service to stranded motorists. During storms, and the earthquakes that are prevalent in California, wireline circuits are often disrupted at the most critical times, making it impossible to use its radio system to dispatch emergency road service trucks in an efficient manner. Often, the wirelines are cut by construction equipment. Unfortunately, once a line is damaged, it usually takes days to get the problem repaired.

Using traditional radio control links to control these base stations presents its own problems. FCC Rule Section 90.261 provides that such fixed use of mobile service frequencies is secondary to mobile service operations and further restricts power near the larger metropolitan areas. Such circuits also require the use of a separate fixed relay station to relay signals from mobile units back to the control point. This adds a level of complexity that increases the

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457.600 MHz and 457.6125 MHz.

possibility of equipment malfunction. The typical mobile relay configuration, allowing the control station to operate much like another mobile unit, greatly simplifies the operation of the system and reduces the possibility of equipment malfunction.

At the same time that removal of the power restriction would create a cost effective solution for operations in desert, mountain and other areas in which CSAA must cover vast stretches of territory, it would also afford the club an important avenue for relieving congestion on its system in urban and suburban areas. In particular, CSAA would be able to pair channels for high-speed, duplex digital data. The California auto clubs have been introducing digital data into their operations in recent years because of severe spectrum crowding, and have found that a traditional dispatch channel will allow only 30 to 40 dispatches per hour, while a digital data channel will allow hundreds of dispatches per hour. Moreover, because the pairing of frequencies will allow duplex operation, messages can be sent back and forth between dispatchers and towing operators without the delay and lost message problems associated with a simplex radio operation.

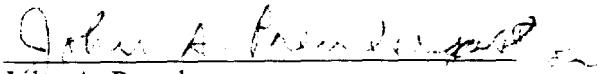
Both of the commenters on this issue supported AAA's proposal to remove the power limit. See Comments of MRFAC at p. 3; Comments of Globe Wireless, Inc. at p. 2. Globe Wireless has suggested that AAA should take responsibility for resolving any interference problems that may arise, within its role as frequency coordinator. CSAA agrees that this is a reasonable request, with the understanding that frequency coordinators may only make recommendations for avoiding or resolving interference situations, and AAA will need the help of the Commission to effectively carry out this role.

MRFAC expresses concern about the proposal of AAA to be the exclusive coordinator of the dockside frequencies, indicating that this would run counter to the competitive coordination scheme adopted in the Commission's Refarming proceeding. See MRFAC Comments at pp. 3-4. MRFAC recommends that the Commission instead adopt the notification scheme proposed by the Land Mobile Communications Council for protection of incumbent licensees when an applicant proposes use of one of the channels shared by Power, Petroleum, Railroad and Automobile Emergency licensees prior to radio service consolidation. However, CSAA supports AAA's proposal to be the exclusive coordinator. The eight dockside channels at issue are configured to be paired with the frequencies for which AAA is already the exclusive coordinator, pursuant to a Commission finding of important public safety considerations. *See Second Memorandum Opinion and Order*, PR Docket No. 92-235, FCC 99-68, released April 13, 1999 (at paras. 16-18). Therefore, this situation differs from the historic sharing of frequencies among various radio services to which MRFAC refers. And indeed, none of the other frequency coordinators (such as the Personal Communications Industry Association or ITA, Inc.) has objected to AAA's proposal, which involves only a small portion of the spectrum allocated for dockside operations. Moreover, CSAA has already experienced instances where applications were filed through another coordinator on the Automobile Emergency channels in a manner that has jeopardized the safe operation of its automobile emergency dispatch system, in many cases even after AAA has been named the exclusive coordinator. See CSAA October 17, 2000 Protest against Milton Bell, Call Sign WPPW597; CSAA May 16, 2000 Protest against Eden Communications, Inc., File No. A046333. Based on this experience, CSAA believes that making AAA the exclusive coordinator is the only way to ensure interference-free operations on the paired auto club-dockside channels.

Accordingly, CSAA supports the proposal to allow certain 457 MHz frequencies to be operated at power levels greater than 2 watts when paired with the 452 MHz frequencies for which AAA has exclusive frequency coordination responsibility. Including these 457 MHz frequencies among those for which AAA has exclusive coordination rights simply makes sense. It will allow AAA to coordinate the frequencies that the auto clubs require for reliable and efficient dispatching of its emergency road service vehicles in areas away from docksides, while protecting cargo handling operations in dockside areas.

Respectfully submitted,

California State Automobile Association



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